

## REMARKS

### I. Title of the Invention

In the Office Action, the Examiner has alleged that the title of the invention is not descriptive. Applicants have amended the title to more descriptive of the present invention.

### I. 35 U.S.C. § 103(a)

In the Office Action, the Examiner has rejected Claims 1-9, 12, 21-22, and 39-42 under 35 U.S.C. 35 U.S.C. § 103(a) as allegedly being unpatentable over Lin, U.S. Patent 6,333,562. Applicants respectfully disagree.

Applicants claim a semiconductor package comprising a substrate. A first semiconductor chip is coupled to a surface of the substrate wherein the first semiconductor chip has a first and second surface which are substantially flat in nature. An adhesive layer is coupled to the second surface of the first semiconductor chip. A second semiconductor chip having first and second surfaces which are substantially flat in nature is provided. What is unique about Applicants' claimed invention is the use of an insulative device. An insulator is coupled to the first surface of the second semiconductor chip. The insulator is used for preventing damage to the wirebonds.

As described in the patent application on Page 7, lines 14-24, since thickness of the adhesive layer used in the prior art may be about the same or thinner than the loop height of the

conductive wires, the conductive wires may be contacted with the first surface of the second semiconductor chip. Thus shorting and damaging the wirebonds. However, the insulator between the adhesive and the second semiconductor package is nonconductive, soft, and elastic in nature. Thus the insulator prevents the conductive wires from coming in contact with the first surface of the second semiconductor chip. Thus, no electrical or mechanical damage to the wires will occur.

In contrast, Lin neither discloses nor anticipates the use of an insulator as claimed by Applicants. Lin discloses a multichip semiconductor device. The Lin device stacks two semiconductor devices together by using an adhesive. The Examiner claims that element 340 in Lin is an insulator. However, the Lin patent clearly states that 340 is an adhesive layer. As Applicant has explained above, the problem with the adhesive layer is that it's not thick enough. Thus, the wires will come in contact with the second semiconductor device thereby damaging the wires.

If required, Applicant can provide affidavits to support their claim that Lin does not disclose any type of insulator and that the use of the insulator helps to overcome the wire damage problems associated with stacked semiconductor packages.

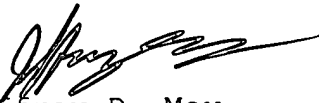
Applicants respectfully submit that Applicants' claimed invention is deserving of patent protection because it describes a useful and functioning apparatus which is patentably distinguishable over the prior art.

In conclusion, Applicant respectfully submit that this Amendment Letter, including the amendments to the Specification, and in view of the Remarks offered in conjunction therewith, are fully responsive to all aspects of the objections and rejections tendered by the Examiner in the Office Action. Applicant respectfully submits that he has persuasively demonstrated that the above-identified Patent Application, including Claims 1-9, 12, 21-22, and 39-42 are in condition for allowance. Such action is earnestly solicited.

If the foregoing does not place the case in condition for immediate allowance, the Examiner is respectfully requested to contact the undersigned for purposes of a telephone interview.

If there are any fees incurred by this Amendment Letter, please deduct them from our Deposit Account NO. 23-0830.

Respectfully submitted,

  
Jeffrey D. Moy  
Reg. No. 39,307  
Attorney for Applicants

Weiss, Moy & Harris, P.C.  
4204 N. Brown Ave.  
Scottsdale, AZ 85251  
(480) 994-8888 (Phone)  
(480) 947-2663 (Fax)

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